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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Performance Measurements and)
Reporting Requirements)
for Operations Support Systems,)
Interconnection, and Operator Services)
and Directory Assistance)

CC Docket No. 98-56
RM 9101

COMMENTS OF THE
BELL ATLANTIC TELEPHONE COMPANIES

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**COMMENTS OF THE
BELL ATLANTIC TELEPHONE COMPANIES¹**

I. Introduction and Summary.

The Commission's approach to performance measurements – providing guidance to the states, but not imposing uniform and mandatory measures – is appropriate in light of the process of negotiations between carriers, with arbitration by the states if necessary, contemplated by the Act. 47 U.S.C. § 252. In adopting any “model rules” as a result of this proceeding, the Commission should make clear that carriers and states are free to adopt performance measurement schemes designed to address the needs of the particular parties involved, which may differ from those proposed by the Commission.

The Commission's stated desire to balance the goals of providing useful information to competitive carriers and regulators and minimizing the burden on local exchange carriers (LECs), NPRM at ¶ 31, also is appropriate. The Commission's

¹ The Bell Atlantic telephone companies (“Bell Atlantic”) are Bell Atlantic-Delaware, Inc.; Bell Atlantic-Maryland, Inc.; Bell Atlantic-New Jersey, Inc.; Bell Atlantic-Pennsylvania, Inc.; Bell Atlantic-Virginia, Inc.; Bell Atlantic-Washington, D.C., Inc.; New York Telephone Company and New England Telephone and Telegraph Company.

proposal, however, with the levels of disaggregation proposed for each of the measurements, if adopted by the states, would require Bell Atlantic to produce at least 13,314 measurements to the Commission each quarter – or nearly 5,000 more measurements than Bell Atlantic currently produces. Bell Atlantic estimates that this would entail over \$3.5 million just in additional development costs – not counting the ongoing costs of collecting and analyzing data and producing reports. The Commission therefore should eliminate redundant, meaningless, or marginally useful measures from its proposal.

Finally, to the extent the Commission provides guidance on methods for evaluating performance measurements, those methods should focus on providing useful information to carriers involved in a business relationship. They should not be used to provide fodder for regulatory gaming.

II. The Commission Should Make Clear That Carriers And States Can Adopt Performance Measures Designed To Address The Particular Needs Of The Parties.

The Telecommunications Act of 1996 establishes a process of negotiation, with arbitration by state commissions if necessary, for carriers to set the terms and conditions governing interconnection of their networks, purchase of services for resale, and access to unbundled network elements. 47 U.S.C. §252. That process is working; Bell Atlantic has signed interconnection and resale agreements with dozens of carriers, the vast majority of which provide for performance measurements.

In addition, Bell Atlantic committed in the context of the proceeding to review the merger with the former NYNEX that it would provide quarterly reports (with monthly detail) on some 22 different categories and covering 100 separate service performance

measurements.² Since the merger, Bell Atlantic has engaged in additional negotiations with a number of carriers concerning performance measurements, standards, and self-executing enforcement mechanisms. Where the parties have not been able to reach agreement on the terms and conditions relating to performance measurements to be included in interconnection agreements, those disputes have been presented to the appropriate state commissions for arbitration.

This process of negotiation and state commission oversight ensures that performance reporting required of the ILECs will meet the reasonable needs of the CLECs, address particular characteristics of individual support systems and processes, and take into account relevant service quality standards of individual states.³ For example, in New York, Bell Atlantic and a number of competing carriers have developed a set of performance measurements that will be tried on an interim basis to allow the parties to determine whether they provide meaningful information.⁴ Those measures do not include a measurement for Average Time to Answer Competing Carrier Calls, one of the measurements proposed in the Notice. The measure is not included in New York because the resale and unbundled element centers there are not high volume call centers,

² Exhibit A to these comments provides a comparison of the measurements proposed in the Notice with those Bell Atlantic currently provides pursuant to the merger commitments.

³ As the Commission has recognized, OSSs vary from carrier to carrier. *Local Competition Provisions in the Telecommunications Act of 1996*, 11 FCC Rcd 15499, ¶ 526; see also *id.* ¶ 523, n. 1273. As a result, a single national set of performance measurements would not take into account the differences in underlying systems and would produce meaningless information. In addition, carriers are subject to service quality standards set by individual state commissions.

but instead are designed to provide competing carriers with dedicated representatives who are familiar with the carrier's operations and approach to the market. In this structure, a measurement for speed of answer – which focuses on a common pool of representatives, any one of whom is available to take the next incoming call – is meaningless.

The Commission's decision to provide guidance to the states, without imposing mandatory, uniform rules, allows the negotiation/arbitration process contemplated by the Act to continue.⁵ The Commission must be careful, however, not to undermine this approach in other contexts. For example, where a state determines that performance measurements negotiated between carriers or arbitrated under the Act are sufficient to ensure nondiscriminatory service, the Commission cannot, in evaluating an application for relief under §271, require that the Bell operating company produce all of the measurements proposed in this Notice. Doing so would be a back-door attempt to make the proposed measures "legally binding," contrary to the Notice, ¶ 4, and could subject the applicant to conflicting requirements from the state and the Commission.

The necessity of allowing states to adopt measures that best suit the particular local circumstances also means that a central clearinghouse would be inappropriate. Notice, ¶ 109. First, performance measurements are designed to provide assurance that local exchange carriers are providing nondiscriminatory service to competing carriers. The level of service being provided by a different LEC in a different state under different

⁴ Exhibit A points out several areas where the New York interim measurements differ from the current measurements provided to the Commission.

⁵ The Notice appropriately does not propose any performance standards or enforcement mechanisms. ¶¶ 125, 130. The Commission cannot adopt such standards or enforcement mechanisms, which are left to the states under the terms of the Act.

circumstances is not relevant to that determination. Second, because carriers and states will adopt measures designed to address local needs, data from another state – even when the name of the measurement is the same – will not necessarily be comparable.

Accordingly, a central data clearinghouse would not provide meaningful information.⁶

III. To Achieve The Goal Of Providing Useful Information While Minimizing The Burden On ILECs, Performance Reports Should Reflect The Actual Operation Of The ILEC's Business And Should Not Require ILECs To Report Performance That Is The Responsibility Of The CLEC.

The performance reports Bell Atlantic provides to the Commission reflect the needs of competing carriers and the actual operation of Bell Atlantic's business. For ordering, provisioning, and maintenance measurements, Bell Atlantic reports separately on five product groups: Interconnection Trunks, Resale POTS services, Resale Special services, UNE POTS services, and UNE Special services. Bell Atlantic's reports therefore reflect all three ways competitors can enter the market – interconnection of their own networks with Bell Atlantic's, purchase of unbundled network elements from Bell Atlantic, and resale of Bell Atlantic's services.

In addition, where relevant to the particular measure, Bell Atlantic provides report detail by Dispatch and Non-Dispatch work. The breakdown between POTS and Special services, and between Dispatch and Non-Dispatch work reflects the way Bell Atlantic actually assigns and performs work for its own customers, as well as for CLECs.

⁶ Because performance reporting requirements may vary from carrier to carrier and state to state, the Commission also should not prescribe uniform data retention policies. Similarly, the Commission should not set rules for the treatment of carrier-specific data. Bell Atlantic has negotiated agreements for the proprietary treatment of both its and other carriers' proprietary data. In addition, states have their own procedures for protecting proprietary information filed with them. The Commission should not establish rules that could conflict with these arrangements.

Moreover, because – for example – an installation order requiring a dispatch may take longer than one that does not, and because Special services require engineering design intervention while POTS services do not, reporting each separately provides a more accurate view of the work performed and avoids masking the performance of either type of work through averaging with other, different work. As a result, Bell Atlantic currently provides the Commission with over 100 separate measures of performance. In some states, Bell Atlantic provides different or additional measures pursuant to state commission orders or interconnection agreements.

By contrast, the level of detail proposed in the NPRM would result in more than 317 separate measures of performance.⁷ The proposed disaggregation, however, would require Bell Atlantic to report on services that it does not provide for itself or for CLECs;⁸ to separate out for report purposes work that is not tracked separately in practice;⁹ or to report separately performance that, by its nature, must be identical for CLEC end users and for Bell Atlantic end users.¹⁰

⁷ Exhibit B compares the level of disaggregation proposed in the Notice with the level of detail Bell Atlantic presently provides to the Commission.

⁸ For example, the Notice lists “Facility Availability” under Pre-Ordering. (Notice, Appendix A) This information is not generally available to Bell Atlantic representatives or to CLEC representatives in the Pre-Ordering phase.

⁹ For example, the Notice proposes that maintenance and repair measures be tracked separately for unbundled loops with INP and unbundled loops without INP (Appendix A), but Bell Atlantic from a maintenance perspective, a loop is a loop – the existence of INP (which, in essence, is a switch feature) does not affect how the loop is maintained.

¹⁰ For example, the Notice proposes to measure the percentage of accurate 911 database updates, and the timeliness of 911 database updates, separately for CLECs and for incumbent LECs. (Notice at ¶¶ 77-79 and Appendix A) Resale orders and Bell Atlantic retail orders that involve updates to the 911 database are handled on a first-come,

Bell Atlantic currently reports separately for each jurisdiction it serves – 13 states and the District of Columbia. This means that Bell Atlantic provides to the Commission 8400 separate measurements each quarter.¹¹ This number does not include measurements provided to individual CLECs; there are currently more than 370 certified CLECs in the Bell Atlantic region.

The NPRM proposes that ILECs report at a state level. On that basis, and assuming quarterly reports with monthly detail, Bell Atlantic would provide 13,314 separate measurements to the Commission each quarter.¹² This is nearly 5,000 more measurements than Bell Atlantic currently provides, just on retail services and performance for CLECs in the aggregate.¹³

There is a substantial cost to providing additional measures. Bell Atlantic estimates that it would incur over \$3.5 million just in additional development costs – not

first served basis – the orders flow through the same systems and processes and, with respect to 911 processing, are treated the same; indeed, at the 911 processing stage, the orders do not even identify whether the end user is Bell Atlantic's or a reseller's customer. As a result, there is no way to measure separately the timeliness or accuracy of resale orders and retail orders.

¹¹ 14 jurisdictions x 100 measurements x 3 months per quarter for both Bell Atlantic and CLECs in the aggregate: $14 \times 100 \times 3 \times 2 = 8400$.

¹² 317 measurements x 14 jurisdictions x 3 months per quarter = 13,314. This does not include separate reports for individual CLECs.

¹³ The Commission asks whether ILECs should report on an MSA or even a wire center level. In the Bell Atlantic region, there are approximately 73 MSAs. This would require Bell Atlantic to provide 69,423 measurements to the Commission each quarter (73 MSAs x 317 measurements x 3 months = 69,423). Bell Atlantic has 2,420 wire centers, which would result in over 2.3 million measurements each quarter (2,420 wire centers x 317 measurements x 3 months = 2,301,420). There would be an even greater multiplier effect on the individual CLEC reports, since Bell Atlantic would have to provide each CLEC a separate report for each MSA or wire center in which it operates.

counting any new equipment that might be needed or the ongoing costs of collecting and analyzing data and producing reports – to provide the proposed measures at a state level.¹⁴

While Bell Atlantic recognizes the need to provide reasonable measurements to competing carriers, regulators and itself, resources should not be devoted to producing redundant, meaningless, or marginally useful measurements.

For similar reasons, the Commission should not require ILECs to develop “jury-rigged” retail measurements where no retail analog exists. The Commission acknowledges that, in a number of cases, there are processes performed and measured for competing carriers that the ILEC does not perform for itself. Yet the Commission nevertheless asks that ILECs propose some retail analog and a way of measuring it “in order to provide a basis for comparison with the average intervals for competing carriers.” Notice, ¶ 59. This makes no sense. Where there are processes or services for CLECs that have no retail analog, the parties should negotiate a reasonable standard that provides the CLEC with a “meaningful opportunity to compete,” not try to invent non-existent functions and measures.

IV. The Commission Should Not Prescribe Rules For Data Analysis.

As discussed above, performance measurements should be negotiated between carriers, with arbitration by the states if necessary. Because the performance measurements produced by individual carriers will almost certainly vary from the

This level of detail would result in many of these measurements being based on sample sizes so small that they would provide no useful information.

¹⁴ This estimate does not reflect the costs of producing reports for individual CLECs. Moreover, the costs would increase geometrically if Bell Atlantic had to develop reports at an MSA or wire center level.

Commission's proposed measurements, the Commission should not prescribe methods for data analysis.¹⁵ There are a variety of accepted statistical methodologies that may be appropriate for different purposes and in connection with different types of measurements. As the Commission notes, "designating specific statistical methods for evaluating an incumbent LEC's performance may limit the use of other analyses that might be more appropriate or that might generate more insight." Notice, Appendix B at ¶ 1. The Commission should instead make clear that carriers and states can select the method of evaluation and analysis most appropriate for their particular situation.

To the extent the Commission attempts to provide guidance to states, however, that guidance should reflect certain key principles. First, while it is desirable that the results of statistical analysis be generally understood and accepted, accuracy should not be sacrificed for simplicity. (Appendix B, ¶ 2) As discussed below, there may be times when a simple t-test is not appropriate, or the conditions for its use are not met. In those cases, other types of statistical tests may provide better information. (See Appendix B, ¶ 8) Several that are computationally complex nevertheless are conceptually understandable by non-statisticians, and their use should not be precluded.

Second, most statistical methodologies rely on strong assumptions. For example, the t-test relies on strong assumptions about the distribution of variances, and on sample

¹⁵ As noted above, it is not appropriate to compare performance measurements from state to state. (Appendix B, ¶ 1) The level of service being provided by a different LEC in a different state under different circumstances is not relevant to the determination of whether a local exchange carrier is providing nondiscriminatory service to competing carriers in a particular state under evaluation. Moreover, because carriers and states will adopt measures designed to address local needs, data from another state – even when the name of the measurement is the same – will not necessarily be comparable.

size. The Commission cannot know whether the assumptions are reasonable for every carrier and every measurement produced. Any guidance concerning statistical methodologies therefore must reflect the importance of assuring that the underlying assumptions are met.

Finally, performance measurements generally, and the statistical evaluation of them in particular, should be focused on providing useful information in a business relationship; they should not be designed as “gotchas.” As just one example, the Commission suggests that a “one-tailed test” might be appropriate for determining whether an ILEC’s performance in provisioning CLEC orders was worse than its performance in provisioning retail orders with this explanation: “A one-tailed test is appropriate when the direction of the expected difference is known. In this case, observers are only interested in the case in which competing carriers receive worse service than the incumbents’ retail customers, not that in which they receive better service.” Appendix B, ¶ 3, n. 3. It should not be the case that “observers” are interested only in one side of the performance equation. CLECs interested in a business relationship, rather than regulatory gaming, and unbiased regulators should be interested in performance for CLECs that is both better and worse than service to retail customers and in changes in the direction of performance. And even if “observers” were interested only in one direction, which they are not, that is not the same as the “direction of the expected difference [being] known.” *Id.*¹⁶

¹⁶ In any event, “[o]ne-tailed tests at the .05 level are viewed as weak evidence – no weaker standard is commonly used in the technical literature.” Federal Judicial Center, *Reference Manual on Scientific Evidence*, at 383, n. 157 (1994).


As another example, with the large number of measurements called for in the Commission's proposal, even when the t-test is run at the 95% level of significance, it is a virtual certainty that hundreds of individual measures will identify a difference in performance where none actually exists. Similarly, as the Commission notes, even statistically significant differences may have no practical competitive consequence and may not justify a conclusion that the ILEC has engaged in discrimination. (Appendix B, ¶ 7) In providing guidance on methods for evaluating performance reports, the Commission should make clear that statistical methods, if appropriately applied, are useful tools for analysis, but cannot be relied on blindly.

CONCLUSION

The process of negotiating performance measurements, with arbitration by states if necessary, is ongoing and the Commission should make clear that its proposed "model rules" are not intended to undermine that process. Because some states may look to the Commission's "model rules" for guidance, however, the Commission also should eliminate meaningless and redundant measures from its proposal. Finally, the Commission should make clear that the purpose of performance measurements is to provide useful information to carriers and regulators – not to provide opportunities for regulatory gaming.

Respectfully submitted,

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Comparison of NPRM Proposed Measurements with Bell Atlantic Commitments

	NPRM Proposed Measurements	Bell Atlantic Committed Measurements	Comments
	PRE-ORDERING		
I.	Average Response Time <ul style="list-style-type: none"> • Due Date Reservation • Feature Function Availability • Facility Availability • Street Address Validation • Service Availability • Appointment Scheduling • Customer Service Records • Telephone Numbers • Rejected Query Notices 	Response Time OSS Interface <ul style="list-style-type: none"> • Customer Service Record • Other Pre-order Functions <ul style="list-style-type: none"> Due Date Reservation Product and Service Availability Street Address Validation Telephone Number Reservation 	<p>Bell Atlantic's performance reports to the Commission include response time for Customer Service Record and for Other Pre-ordering Functions in the aggregate. Due Date Reservation and Appointment Scheduling (listed separately in the Notice) are the same function, and are encompassed in Bell Atlantic's Due Date Reservation measure. Feature Function Availability and Service Availability (listed separately in the Notice) are both encompassed in Bell Atlantic's Product and Service Availability Measure. In the New York Pre-filing Statement, Bell Atlantic has committed to disaggregate the other pre-order functions.</p> <p>Bell Atlantic samples 10 transactions per hour from 8 a.m. to 5 p.m. via Sentinel system. Sentinel replicates transactions of a Bell Atlantic service representative using the OSS and of a CLEC representative accessing the OSS through the interface. The sampling method is statistically valid and assures an apples-to-apples comparison because it measures the same type and complexity of requests for Bell Atlantic and for CLECs across the same time of day. (¶ 43) Because of the sampling methodology, performance is reported for all CLECs in the aggregate and for Bell Atlantic.</p>

	NPRM Proposed Measurements	Bell Atlantic Committed Measurements	Comments
	ORDERING/PROVISIONING		
II. A.	Order Completion Measurements <ul style="list-style-type: none"> • Average Completion Interval • Percentage of Due Dates Missed 	Average Offered Interval Average Completed Interval % Completed within 5 Days (POTS 1-5 Lines) % Missed Installation Appointments % Missed Appointments - Facilities	<p>The NPRM proposes no exclusion for delays in completing orders caused by the CLEC or its customer. (Appendix A)</p> <p>The NPRM proposes to measure Average Completion Interval for CLECs from ILEC receipt of a valid order to return of a completion notification to the CLEC, because "this notice informs the competing carrier that it may begin billing the customer for service." (§ 64) Average Completion Interval for ILECs, however, is defined as the time from entry of an end user order into the order processing system to completion of the order, though "initiation of customer billing . . . need not have begun." (§ 53, n. 77) Similarly, completion by the committed due date for CLECs requires not just completion of the work, but return of the completion notification by the committed due date. (§ 54, n. 79)</p> <p>These definitions virtually guarantee that the measurements will show worse performance for CLECs than for Bell Atlantic, even if performance is, in fact, exactly equal. First, the interval for Bell Atlantic is the time it takes to complete an order, while the interval for a CLEC is the time it takes to complete an order <i>plus</i> the time it takes to return a completion notification. In order to show equal intervals for these measures, Bell Atlantic would always have to complete the work for the CLEC <i>faster</i> than it completes work for its own customers. Second, before Bell Atlantic can send a completion notification to the CLEC, it must not only complete the work, but also complete the record changes necessary to allow billing by the CLEC to begin – a step that can take a day or more</p>

			<p>after the work is completed. That step takes the same amount of time for a retail order, but is not included in the measure for completion of a retail order.</p> <p>Bell Atlantic is also reporting two additional measures to the Commission: Average Offered Interval and % POTS orders for 1-5 lines completed in 5 days.</p>
II. B.	Coordinated Customer Conversions <ul style="list-style-type: none"> Average Coordinated Customer Conversion Interval 	Percent Ported Number Orders completed in > 1 Hour (NY Pre-filing)	<p>This measure proposed in the NPRM is meaningless on an order-by-order basis, where orders may include multiple loops. (See Appendix A) The only meaningful measure, however, would require giving each frame attendant and RCMAC clerk a stopwatch to measure every loop and every telephone number, which would impede their ability to perform their assigned job functions. With the availability of LNP, there will no longer be a need for any measurement of this type.</p>
II. C.	Order Status Measurements <ul style="list-style-type: none"> Average Reject Notice Interval Average FOC Notice Interval Average Jeopardy Notice Interval Percentage of Orders Given Jeopardy Notices Average Completion Notice Interval 	Order Confirmation Timeliness Reject Timeliness Timeliness of Completion Notification	<p>There are no equivalent retail measurements and the Commission should not require the ILECs to create them. (§ 59)</p> <p>Bell Atlantic tracks orders in WFA. WFA could measure the interval from due date to an order being marked as "jep," but cannot measure from due date to actual notification of a CLEC. As a result, the jeopardy notice measurements should be eliminated. (§§ 62, 63)</p>
II. D.	Held Order Measurement <ul style="list-style-type: none"> Average Interval for Held Orders 	Average Delay Days (NY Pre-filing)	<p>The NPRM proposes no exclusion for delays in completing orders caused by the CLEC or its customer. (Appendix A)</p>
II. E.	Installation Troubles Measurement <ul style="list-style-type: none"> Percentage of Troubles in 30 days for New Orders 	% Installation Troubles within 30 Days	<p>The NPRM proposes no exclusion for troubles not caused by the ILEC (e.g., CPE troubles). (Appendix A)</p>

	NPRM Proposed Measurements	Bell Atlantic Committed Measurements	Comments
II. F.	Order Quality Measurements <ul style="list-style-type: none"> Percentage of Order Flow Through Percentage of Rejected Orders Average Submissions per Order 	% Rejects % Flow-Through Orders	<p>These measures do not have retail equivalents. For example, all of Bell Atlantic's retail orders must be manually typed. Moreover, the percentage of orders that flow through for CLECs will vary with the mix of services they sell – if CLECs sell proportionally more complex business services and fewer residential POTS services, their flow through percentage will be lower than if the mix is reversed. As a result, the Commission should not attempt to “jury-rig” a retail measurement.</p>
II. G.	911 Database Update and Accuracy <ul style="list-style-type: none"> Percentage of Accurate 911 and E911 Database Updates Percentage of Missed Due Dates for 911 and E911 Database Updates OR Average Time to Update 911 and E911 Databases		<p>Resale orders and Bell Atlantic retail orders that involve updates to the 911 database are handled on a first-come, first served basis – the orders flow through the same systems and processes and, with respect to 911 processing, are treated the same. As a result, there is no practical, automated way to measure separately the timeliness or accuracy of resale orders and retail orders. In the north, Bell Atlantic processes unbundled local switching in the same manner as it does resale orders; as a result, 911 database updates are commingled with resale and retail orders and cannot be measured separately. In the south, Bell Atlantic provides CLECs purchasing unbundled local switching the capability of entering their own 911 information on a mechanized basis. (§§ 77-79)</p>

	NPRM Proposed Measurements	Bell Atlantic Committed Measurements	Comments
	REPAIR AND MAINTENANCE		
III.	Average Time To Restore Frequency of Troubles in 30-Day Period Frequency of Repeat Troubles in 30-Day Period Percentage of Customer Troubles Resolved Within Estimated Time	Mean Time to Repair Customer Trouble Report Rate % Repeat Trouble Reports within 30 Days Missed Repair Appointments Out of Service > 24 Hours	<p>The NPRM proposes no exclusion for troubles not caused by the ILEC (e.g., CPE troubles) or for trouble reports that Bell Atlantic will receive from its retail customers but not from CLECs (e.g., troubles with disposition code "test OK" – since the CLEC performs the test for its customers, it would not report such troubles to Bell Atlantic). As a result, the NPRM will not produce comparable retail and wholesale measurements. (§ 87 and Appendix A)</p> <p>The NPRM defines the Time to Restore as the interval from receipt of a trouble ticket to return of a notice that the trouble has been cleared. Similar to Average Completion Interval, discussed above, this definition would require Bell Atlantic to provide better service to CLECs than to its retail customers in order to produce a measurement that appears equal. (§ 82)</p>
	BILLING		
IV.	Average Time to Provide Usage Records Average Time to Deliver Invoices	Timeliness of Daily Usage Feed <ul style="list-style-type: none"> • % in 3 business days • % in 4 business days • % in 5 business days • % in 8 business days Timeliness of Carrier Bill	<p>There is no equivalent retail measurement and the Commission should not require the ILECs to create one. (§ 89)</p> <p>Bell Atlantic reports the percent of carrier invoices ready for distribution in 10 business days.</p>

	NPRM Proposed Measurements	Bell Atlantic Committed Measurements	Comments
	GENERAL		
V. A.	Systems Availability Measurement <ul style="list-style-type: none"> Percentage of Time Interface is Available 	OSS Interface Availability	<p>Bell Atlantic reports the availability of the pre-order interface. Bell Atlantic service representatives and CLEC service representatives obtain pre-ordering information from the same underlying OSS. As a result, if a particular OSS is down, it is equally unavailable to Bell Atlantic employees and to CLEC employees. Any difference in availability, therefore, will be caused by unavailability of the interface. Bell Atlantic reports % of time interface is actually available compared to scheduled availability. For the former NYNEX states, the pre-order interface availability also represents the availability of the ordering and maintenance interfaces; for the former Bell Atlantic states, the pre-order interface availability also represents the availability of the maintenance interface. (§ 91)</p>
V. B.	Center Responsiveness <ul style="list-style-type: none"> Average Time to Answer Competing Carrier Calls 		<p>Transactions for CLECs are electronic in nature. The call centers handling CLECs are designed as "fall-out" centers, handling exceptions and performing "help" functions. Consequently these centers are not designed to be high volume call centers and are not analogous to the retail center handling calls for Bell Atlantic end users. Accordingly, this is not a meaningful measure. (§ 92)</p>

	NPRM Proposed Measurements	Bell Atlantic Committed Measurements	Comments
V. C.	OS/DA <ul style="list-style-type: none"> Average Time to Answer 		<p>Where Operator Services and Directory Assistance calls for CLECs are handled by the same Operators and call distributors as Bell Atlantic end users operator services calls, both types of calls are in the same queue to answer, and performance can not be different. The only way to measure performance separately for a CLEC would be to put all of their traffic on to a separate operator group and to establish separate queueing mechanisms for each CLEC, thereby increasing the likelihood of different treatment. Bell Atlantic reports the aggregate measure to a number of state commissions. A small percentage of CLEC calls are handled in separate Bell Atlantic wholesale centers. In these cases, Average Time to Answer is provided in parity to Bell Atlantic end user calls. (§§ 94, 94)</p>
	INTERCONNECTION		
VI. A.	Trunk Blockage Measurements <ul style="list-style-type: none"> Percent Blockage on Interconnection Trunks Percent Blockage on Common Trunks 	% Common Trunk Blocking % Dedicated Final Trunk Blocking	<p>The NPRM misinterprets the blocking standard reported in BA's performance reports. (§ 98) The appropriate design for a common final trunk group carrying only local traffic is B.01; the appropriate design for a common final trunk group carrying both local and IXC traffic is B.005. Bell Atlantic reports the percentage of trunk groups that exceed these thresholds. These measures conform to industry practice and are consistent with Commission directives.</p> <p>Common trunks carry both BA traffic and CLEC traffic. In some geographic areas, common trunks also carry IXC traffic. It is not possible to report CLEC blockage separately on common trunks that also carry BA local traffic. The distinction the NPRM attempts to draw between types of common trunks makes no sense and therefore should not be the basis of any measurement. (§§ 99, 100)</p>

			<p>The structure of the Bellcore report referenced in ¶ 100 is appropriate for local as well as IXC common trunks. Indeed, in many instances trunk groups already carry both types of traffic. Some minor modifications to accommodate the additional trunk groups for local common trunks would be necessary.</p> <p>Call completion rates (¶ 101) would not provide a useful measurement. Bell Atlantic's current network management system provides call completion data in the aggregate for many types of calls: local, intraLATA toll, IXC calls, intra-switch calls, operator calls, and directory assistance calls. The system cannot separate out particular types of calls (e.g., local) and cannot separate out calls to Bell Atlantic customers from calls to other carriers' customers. A better way to ensure that Bell Atlantic is engineering, provisioning, and servicing trunk groups for CLECs at an equivalent level to what it does for itself, would be to compare trunk utilization – trunks required for the level of traffic divided by trunks in service.</p>
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	NPRM Proposed Measurements	Bell Atlantic Committed Measurements	Comments
VI. B.	Collocation Measurements <ul style="list-style-type: none"> • Average Time to Respond to a Collocation Request • Average Time to Provide a Collocation Arrangement • Percent of Due Dates Missed With Respect to the Provision of Collocation Arrangements 	Average Time to Provide Physical Collocation Cage (NY Pre-filing)	<p>Collocation arrangements – whether physical or virtual – can vary tremendously in size and complexity depending on the CLEC’s desires. In addition, the timely completion of collocation arrangements depends significantly on CLEC actions, such as delivery of transmission equipment and installation of fiber optic cables. CLECs have the option of contracting directly with a Bell Atlantic-approved vendor for engineering and installation of equipment for a virtual collocation arrangement, giving CLECs extensive control over the interval in which the arrangement is completed. Finally, on a number of occasions, Bell Atlantic has had collocation orders cancelled or put on hold by the CLEC after Bell Atlantic has expended considerable time and effort working to complete the arrangements. (§§ 102, 103)</p> <p>The NPRM proposes no exclusion for performance that is the CLEC’s responsibility or under its control. (Appendix A) Bell Atlantic has committed in the New York Pre-filing Statement that it will measure the average time to provide a physical collocation cage to the CLEC. This appropriately measures performance that is within Bell Atlantic’s control.</p>

Comparison of NPRM Proposed Categories with Bell Atlantic Commitments

	NPRM Proposed Categories	Bell Atlantic Committed Categories	Comments
	PRE-ORDERING		
	<ul style="list-style-type: none"> • Competing Carriers • Incumbent LECs 	<ul style="list-style-type: none"> • CLEC Aggregate • BA Retail 	<p>Bell Atlantic's simulation methodology for reporting is statistically valid and ensures comparison of like transactions over the same time period. It also covers the complete transaction, from enter key to display for both CLECs and BA retail representatives.</p>
	ORDERING		
	<p>Competing Carriers:</p> <ul style="list-style-type: none"> • Resale Residential POTS <ul style="list-style-type: none"> • Dispatch • Non-Dispatch • Resale Business POTS <ul style="list-style-type: none"> • Dispatch • Non-Dispatch • Resale Specials <ul style="list-style-type: none"> • Dispatch • Non-Dispatch • UNE Loops <ul style="list-style-type: none"> • W/ interim number portability • W/out INP • UNE Switching • Combinations of UNEs <ul style="list-style-type: none"> • Dispatch • Non-Dispatch • Interconnection Trunks 	<p>Competing Carriers:</p> <ul style="list-style-type: none"> • Resale POTS <ul style="list-style-type: none"> • Mechanized Orders • Non-Mechanized Orders (<10 lines) • Non-Mech. Orders (10+ lines) • Resale Specials <ul style="list-style-type: none"> • Mechanized Orders • Non-Mechanized Orders (<10 lines) • Non-Mech. Orders (10+ lines) • UNE POTS <ul style="list-style-type: none"> • Mechanized Orders • Non-Mechanized Orders (<10 lines) • Non-Mech. Orders (10+ lines) • UNE Specials <ul style="list-style-type: none"> • Mechanized Orders • Non-Mechanized Orders (<10 lines) • Non-Mech. Orders (10+ lines) • Interconnection Trunks 	<p>The requirement of a dispatch, whether the order is for business or residence or includes or does not include number portability has no relationship to the measures included in ordering (order confirmation, rejects and completion notification) However, the size of the order and whether the order could "flow-through" to the ordering OSS have significance on how long it takes to process the actual order. For BA, line size breakouts in ordering relate to the requirement to check for facilities, a manual work step for both retail and CLEC orders.</p> <p>"Order Quality" measures are reported as follows:</p> <ul style="list-style-type: none"> • Resale • UNE • Interconnection Trunks

	NPRM Proposed Categories	Bell Atlantic Committed Categories	Comments
	ORDERING (continued)		
	Incumbent LECs: <ul style="list-style-type: none"> • Retail Residential POTS <ul style="list-style-type: none"> • Dispatch • Non-Dispatch • Retail Business POTS <ul style="list-style-type: none"> • Dispatch • Non-Dispatch • Retail Specials <ul style="list-style-type: none"> • Dispatch • Non-Dispatch 	Incumbent LECs: <ul style="list-style-type: none"> • Nothing Reported for ordering 	There are no analogous processes for ordering in retail. In lieu of retail performance, BA utilizes absolute standards for ordering comparisons.
	EXCLUSIONS: <ul style="list-style-type: none"> • Cancelled Orders • Initial order when supplemented by competing carrier • Incumbent LEC orders associated with internal or administrative use of local services 	All orders that are confirmed or rejected are included.	